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July 28, 1992

RECEIVED
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OF COUNSEL
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

* ADMITTED VA ONLY

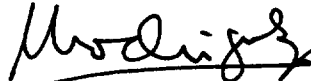
Ms. Donna Searcy
Secretary
The Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: ET Docket No. 92-28; File Nos. PP-29-33

Dear Ms. Searcy:

Attached is a copy of a request filed today with the Managing Director on behalf of TRW Inc. for the disclosure and inspection of documents pursuant to 47 C.F.R. § 0.461. Because the request concerns the above-referenced docket, kindly file this letter and its attachment in ET-Docket 92-28.

Respectfully submitted,



Raul R. Rodriguez
Norman P. Leventhal

Counsel to TRW Inc.

RRR:nc
Attachment
cc: All parties of record (w/attachment)

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July 28, 1992

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VIA HAND DELIVERY

Mr. Andrew S. Fishel
Managing Director
Federal Communications Commission
Room 852
1919 M Street, N.W.
Washington, D.C. 20554

Re: Freedom of Information Act Request
ET Docket No. 92-28; File No. PP-29-33

Dear Mr. Fishel:

TRW Inc. ("TRW"), through undersigned counsel, pursuant to Section 0.461 of the Commission's Rules, 47 C.F.R. § 0.461, hereby requests access to, and to inspect and copy, any and all documents, records, letters, memoranda, notes, photocopies, computer-stored information, and any other information, regardless of the form in which it is held by the Commission, relating to the above-referenced docket and concerning the matters enumerated below.

1. TRW has learned (and has confirmed through FCC sources) that the Commission has received the advice of non-FCC employees (or temporary "detailed" FCC employees) concerning the merits of pioneer's preference requests in ET Docket 92-28. TRW has filed a request for a pioneer's preference which is pending in ET Docket 92-28, PP-33. Any such reports, comments, recommendations, assessments, advice, or information provided to the Commission in any form may have a substantial bearing on the award of a pioneer's preference to one or more of the parties in Docket 92-28 (of which TRW is one) and, consequently, can significantly affect TRW's interest in the orderly processing of its pending LEO MSS application, file nos. 20-DSS-P-91(12), CSS-91-015.

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Paragraph 50, note 11 of the Commission's Report and Order released May 13, 1991, adopting the pioneer's preference rule (6 FCC Rcd 3488, 3494, 3500) requires that any such outside advice be placed on the public record and be subject to comment by the parties. Neither has been done in this case.

Accordingly, TRW requests an opportunity to access, inspect and copy:

a. A list of all persons not regularly and permanently employed by the FCC who have provided the FCC with written or oral comments, advice, or assessments with respect to the various pioneer's preference requests in Docket 92-28, which comments, advice or assessments are not part of the public record. Also provide the dates of all such comments, advice, or assessments; and a description of the form of such comments, advice or assessments.

b. A list of the names of all temporary FCC personnel, which may have been detailed to the FCC from other government agencies, including but not limited to the National Aeronautics and Space Administration, the Department of Defense and the Department of Commerce, for the purpose of evaluating, reviewing, assessing, and/or giving advice or opinions concerning or affecting the pioneer's preference requests in ET Docket 92-28. Provide documents indicating starting and ending dates of all such temporary transfers, i.e., "detailing", to the FCC, and any agency records associated with such transfers. This request includes disclosure and inspection of all interagency correspondence on this subject.

c. All documents, comments, advice, assessments, reports, memoranda, notations, minutes of meetings, any other written documentation, or notations of oral presentations provided by individuals identified in requests 1.a and 1.b above, which bear in any way on the pioneer's preference requests pending in ET Docket 92-28.

TRW will pay any reasonable search or duplication charges in connection with this request.

Please justify any denial of this request, whether in whole or in part, by reference to specific statutory exemptions. Also, please release any parts of the materials requested for inspection which are segregable from any portion declared to be exempt from inspection. TRW reserves the right

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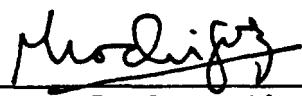
Mr. Andrew S. Fishel
June 28, 1992
Page 3

to appeal from a decision denying this request in whole or in part.

Respectfully submitted,

TRW INC.

By:



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2000 K Street, N.W.
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(202) 429-8970

Its Attorneys

RRR:nc

cc: Dr. Thomas P. Stanley, Chief Engineer (By Hand)

CERTIFICATE OF SERVICE

I, Nesa Chappelle, hereby certify that a copy of the foregoing Letter was served via hand and first-class mail, postage prepaid, this 28th day of July 1992, on the following persons:

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